

#### AMENDMENTS TO THE DRAWINGS

FIG. 2 is amended to include reference number 60 identifying the capacitor provided by the first and second electrode plates 37 and 46. An annotated sheet showing changes and replacement sheet are included in the Appendix following page 11 of this paper.

**REMARKS**

Claims 1-36 are pending in the application.

Of the above claims, claim 36 is withdrawn from consideration.

Claims 34 and 35 are allowed.

Claims 1-4, 7 and 8 are rejected.

Claims 5, 6 and 9-33 are objected to.

Claims 1-33 are rejected under 35 U.S.C. 112, first paragraph.

Claims 1-4, 7 and 8 as best understood are rejected under 35 U.S.C. 102(e).

No new matter is added.

Claims 1-35 remain in the case for consideration.

Applicant requests reconsideration and allowance of the claims in light of the above amendments and following remarks.

***Allowable Subject Matter***

Claims 6, 9-33 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 34 and 35 are allowed. The Examiner states that the cited art of record fails to disclose and/or suggest the limitations set forth in these claims.

***Claim Rejections - 35 USC § 112 - Examiner Interview Summary***

Claims 1-33 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement.

In a telephonic interview between the Applicant and the Examiner, conducted on August 31, 2005, the Examiner clarified that rejection was due to the capacitor not being specifically identified within any of the drawings. In response to the Applicant's question on how to overcome this rejection, the Examiner agreed that a separate reference number could be added to FIG. 2 to identify the capacitor formed by electrodes 37 and 46. FIG. 2 is amended to identify the capacitor as reference number 60 and a replacement sheet with the amended figure is included and can be found in the Appendix following page 11.

***Claim Rejections - 35 USC § 102***

Claims 1-4, 7 and 8 as best understood are rejected under 35 U.S.C. 102(e) as being anticipated by Siniaguine (US 6,730,540 B2) ("Siniaguine").

Applicant respectfully traverses the rejections.

With respect to independent claim 1, the claim recites that a first semiconductor chip is coupled with a first electrode plate and second semiconductor chip is coupled with a second electrode plate and these two plates coupled to the semiconductor chips are arranged to provide a decoupling capacitor. As seen in, for example, amended FIG. 2, first electrode plate 37 is coupled to the first chip 30 and the second electrode plate 46 is coupled to the second upper chip 40. These two coupled electrodes, 37 and 46 are arranged to provide the decoupling capacitor 60 between the first and second chips 30 and 40.

Siniaguine, however, fails to disclose a first electrode plate coupled to the first circuit and a second electrode plate coupled to the second circuit as recited in claim 1. In the description of FIGS. 14A and 14B, no mention is made of any electrode plate coupled to the integrated circuit 920.

Furthermore, the interposer 320 of Siniaguine is cited as being a decoupling capacitor itself between the circuit 310 and the integrated circuit 920. At column 6, lines 1-3, Siniaguine merely discloses that the interposer 320 can include a decoupling capacitor. Furthermore, at column 1, lines 39-49, however, Siniaguine discloses that interposer 320 is an integrated circuit that is "a semiconductor die or wafer, or some portion of a semiconductor wafer."

Thus, a decoupling capacitor between circuits 310 and 920 is not provided by electrode plates coupled to these circuits. Rather, any decoupling capacitor present is in a wholly separate integrated circuit interposed between the two circuits.

Thus, Siniaguine fail to disclose each and every element of independent claim 1, e.g., "the first electrode plate and the second electrode plate arranged to provide a decoupling capacitor between the first semiconductor chip and the second semiconductor chip." Therefore, claim 1 is believed to be allowable over Siniaguine and allowance is respectfully requested.

Claims 2-4, 7 and 8 depend from independent claim 1, and for at least the same reasons these claims are believed to be allowable over Siniaguine and allowance is respectfully requested.

Further, with respect to claims 2, 4, 7 and 8, the Examiner cites Siniaguine as disclosing first rerouting lines coupled with the circuit 310 where the electrode plate and first

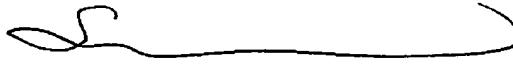
rerouting lines constitute part of a first rerouted chip 310 without citing any specific reference numbers, figures or support text. Siniaguine does not disclose rerouting lines or an electrode plate coupled with circuit 310. Thus, Siniaguine fails to disclose the further limitations of claims 2, 4, 7 and 8.

*Conclusion*

For the foregoing reasons, reconsideration and allowance of claims 1-35 of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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I hereby certify that this correspondence  
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 MULTI-CHIP BALL GRID ARRAY PACKAGE  
 Attorney Docket No. 9903-080/Application No. 10/828,792

## Annotated Sheet Showing Changes

1/1

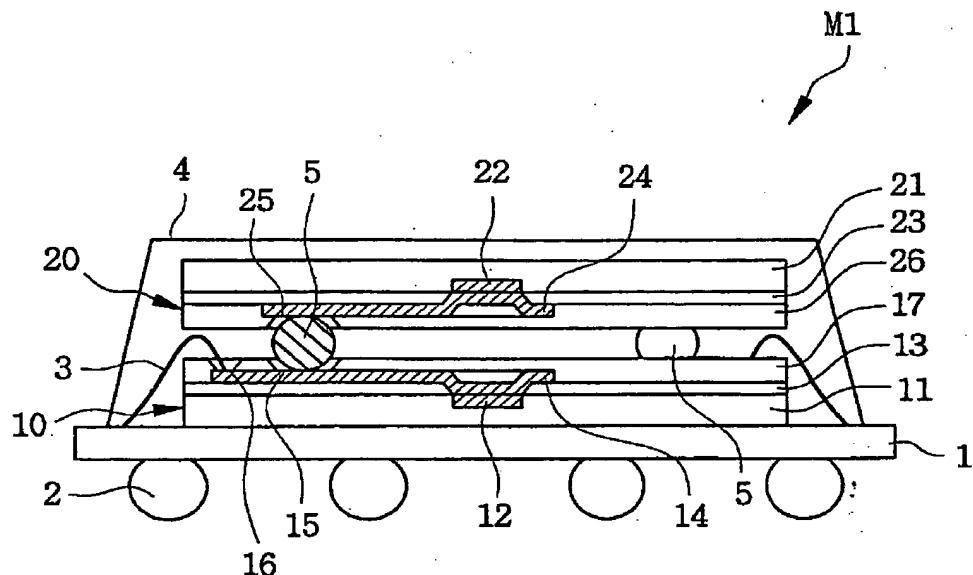
FIG. 1  
(Prior Art)

FIG. 2

